

Message

From: Welles, Laura [Welles.Laura@epa.gov]
Sent: 11/8/2016 11:34:27 PM
To: Fogarty, Johnpc [Fogarty.Johnpc@epa.gov]
Subject: RE: WF audit - draft #1
Attachments: EPAandWF_compare drafts_11_2_2016_lkwedits_11_8_16.docx

So I was a bit optimistic re: timing for getting this to you today...

See attached -- it still needs work, but it's getting there...

I may change the stipulations section (R6 did have stipulated penalties, but framed differently). I need to add language re: parties bound. I also want to think of deadlines for the injunctive relief, etc.

-----Original Message-----

From: Fogarty, Johnpc
Sent: Tuesday, November 08, 2016 4:20 PM
To: Welles, Laura <Welles.Laura@epa.gov>
Subject: RE: WF audit - draft #1

I am not looking at anything tonight.

-----Original Message-----

From: Welles, Laura
Sent: Tuesday, November 08, 2016 4:19 PM
To: Fogarty, Johnpc <Fogarty.Johnpc@epa.gov>
Subject: RE: WF audit - draft #1

Ok -- I'm just finishing up on the compliance piece and will send to you within the hour (from now).

-----Original Message-----

From: Fogarty, Johnpc
Sent: Tuesday, November 08, 2016 4:15 PM
To: Welles, Laura <Welles.Laura@epa.gov>
Subject: RE: WF audit - draft #1

If you can share what you have now, that would be great. And yes, it may make sense to talk through a few major issues/areas. And I am about out of patience waiting on the intel re the UW count!!!

-----Original Message-----

From: Welles, Laura
Sent: Tuesday, November 08, 2016 3:54 PM
To: Fogarty, Johnpc <Fogarty.Johnpc@epa.gov>
Subject: RE: WF audit - draft #1

Quick update:

I plan to meet with Diana and Andy tomorrow morning at 9:30 re: make sure revised draft is consistent with what WEB has sent to EAB in the past. Do you want to see draft of the revised CAFO later today or wait until after I meet with them in case there are some minor changes, etc.?

Ex. 5 AC/AWP/DP

What are your thoughts on when to get the revised draft back to WF? I want to hear from WF about why they took count II out, etc. and so it may make more sense to explain Thursday during the call re: big picture on what changes we made, get more info on count II, and then send revised draft after the Thursday call. Thoughts?

Also -- I did touch base with Gary J. re: paperwork reduction and ex parte waivers. He was very helpful - thanks for the suggestion to speak with him. Based on my discussion with him, I think it's fine to take both of these waivers out of the CAFO. The catchall waiver stays in -- WF deleted "any right they may have to contest the allegations in this CAFO" in the first part of the waiver above the paperwork reduction act (formerly paragraph 24), but I rejected this change.

-----Original Message-----

From: Welles, Laura
Sent: Tuesday, November 08, 2016 8:40 AM
To: Fogarty, Johnpc <Fogarty.Johnpc@epa.gov>
Subject: RE: WF audit - draft #1

Moving along -- I plan to get a revised draft to you later this afternoon.

-----Original Message-----

From: Fogarty, Johnpc
Sent: Tuesday, November 08, 2016 8:38 AM
To: Welles, Laura <Welles.Laura@epa.gov>
Subject: RE: WF audit - draft #1

Ok, thx. How's the revisions to the cafo coming?

-----Original Message-----

From: Welles, Laura
Sent: Tuesday, November 08, 2016 8:14 AM
To: Fogarty, Johnpc <Fogarty.Johnpc@epa.gov>
Subject: RE: WF audit - draft #1

I'll take a look at this today and get back to you with any feedback.

-----Original Message-----

From: Fogarty, Johnpc
Sent: Friday, November 04, 2016 5:01 PM
To: Welles, Laura <Welles.Laura@epa.gov>
Subject: WF audit - draft #1

Draft CAFO language and a revised explanation/description.

Ex. 5 AC/AWP/DP

Ex. 5 AC/AWP/DP

The CAFO provisions is set up as an appendix, to make drafting that part easier (the placeholder in the main body can just refer to it). This is a first cut, but would appreciate your feedback. Thx!